

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Part 97 of the Commission's Rules)	WT Docket No. 05-235
To Implement WRC-03 Regulations Applicable to)	
Requirements for Operator Licenses in the)	November 14, 2005
Amateur Radio Service)	

REPLY COMMENTS OF BRENNAN T. PRICE

Pursuant to Section 1.415 of the Commission's Rules, Brennan T. Price hereby timely submits these reply comments in the above captioned proceeding. In comments filed October 31, 2005, Price supported the adoption of the rules proposed in the Notice of Proposed Rulemaking and Order released July 19, 2005,¹ and petitioned for further rulemaking to eliminate an untracked, unenforceable, unnecessary, unwise, de facto fourth license class by granting all Technician Class licensees the operating privileges currently enjoyed by Novice, Technician Plus, and Technician Class operators who have demonstrated telegraphy proficiency. In these reply comments, Price notes that other prominent commenters agree that a unification of Technician Class operating privileges is ripe for consideration, and asserts that the changes proposed in the Petition for Further Rulemaking section of his earlier comments represent the absolute *minimum* changes necessary for the Commission to address the needs of the amateur radio service.

¹ Amendment of Part 97 of the Commission's Rules to Implement WRC-03 Regulations Applicable to Requirements for Operator Licenses in the Amateur Radio Service, *Notice of Proposed Rulemaking and Order*, 20 F.C.C.R. 13,247 (2005) [hereinafter *NPRM*].

I. ANY FURTHER DISCUSSION OF THE MORSE TELEGRAPHY TESTING REQUIREMENT IS CUMULATIVE.

The volume and tenor of the comments made in this proceeding with respect to the Morse telegraphy requirement clearly indicate the zealousness with which many commenters view the issue. It can safely be said that nothing is left to be said, and Price foregoes the opportunity to file substantive reply comments on this issue.

II. OTHER COMMENTERS CONFIRM THAT AT LEAST A UNIFICATION—IF NOT AN EXPANSION—OF TECHNICIAN CLASS OPERATING PRIVILEGES IS RIPE FOR CONSIDERATION.

It is notable that the two major publishers of amateur radio periodicals, ARRL and CQ Communications, made cogent arguments for the allocation of HF operating privileges to all Technician Class licensees once the telegraphy requirement is removed. CQ Communications proposes to merge the Novice and Technician Classes into one class with privileges equivalent to current Technician Plus Class operators or Technician Class operators who have demonstrated proficiency in telegraphy.² ARRL proposes the granting of substantial and meaningful HF operating privileges on the 80, 75, 40, 15, and 10 meter bands.³ While this petitioner has proposed a more modest change in the rules, he joins ARRL and CQ Communications in asserting that an entry level license class should offer a new amateur licensee “an appropriate variety of operating privileges.”⁴ By petitioner’s own admission, he has proposed the absolute *minimum* further rulemaking necessary to achieve this goal and simultaneously eliminate the untracked, unenforceable,

² CQ Communications, Comments, at ¶ 19.

³ ARRL, Comments, at ¶ 15.

⁴ *Id.*

de facto fourth license class of Technicians who have demonstrated proficiency in telegraphy on or after April 15, 2000. The spirit of Price's petition will be amply served by the timely amendment of the amateur service rules in accordance with either of the petitions cited herein, and ARRL is to be particularly commended for proposing privileges for Technician Class operators that are substantial, meaningful, and appropriate for an entry level license in the post-WRC-2003 world. However, even if the Commission is reluctant to propose further sweeping changes, Price's proposed changes must be implemented to eliminate an artificial disparity among Technician Class licensees, all of whom have demonstrated knowledge of at least rudimentary HF operating practice.⁵ The public interest, necessity, and convenience require the Commission to eliminate regulatory distinctions with no basis, and the only basis for the current untracked distinction among Technician Class licensees will disappear if the Commission adopts the rules it now proposes.

CONCLUSION

For the foregoing reasons, the Commission should continue this proceeding to consider at least the unification, and preferably the expansion, of Technician Class operating privileges in the post-WRC-03 world..



Brennan T. Price
November 14, 2005

⁵ See Brennan T. Price, Comments, nn. 16-17 and accompanying text.